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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

PHYLLIS NICHOLS, ROBIN COOK, and
LAWRENCE NOVIDA, on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 4:24-CV-02914-JSW

**JOINT STIPULATION AND
[PROPOSED] ORDER ON CASE
MANAGEMENT SCHEDULE**

Date Action Filed: April 9, 2024

Judge: Honorable Jeffrey S. White

WHEREAS, on October 8, 2024, this Court ordered the parties “to meet and confer and propose a joint case management schedule by October 25, 2024” that “need not include anticipated trial dates or pretrial deadlines” (Dkt. 34);

WHEREAS, Meta Platforms Inc. (“Meta”) and plaintiffs met and conferred and agreed upon a proposed joint case management schedule;

WHEREAS, in the Rule 26(f) Report and Initial Case Management Statement (Dkt. 32), Meta “request[ed] that discovery in this case be referred to Magistrate Judge DeMarchi so that it can be coordinated with discovery in the other actions pending in the Northern District of California against Meta related to the use of the Meta Pixel in which discovery similarly has been referred to Judge DeMarchi”;

WHEREAS, plaintiffs do not oppose referral and coordination of discovery with Judge DeMarchi.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between plaintiffs and Meta, subject to the approval of this Court, that:

1. All discovery matters are referred to Magistrate Judge Virginia K. DeMarchi; and
2. The joint proposed case management schedule is as follows:

Case Event	Deadline
Amendments to Pleadings deadline	January 3, 2025
Completion of all fact discovery	May 4, 2026
Plaintiffs’ motion for class certification and any expert reports in support of class certification due	June 3, 2026
Defendant’s opposition to Plaintiff’s motion for class certification and any class certification expert reports due	August 12, 2026
Plaintiffs’ reply brief on class certification due	September 25, 2026
Deadline for Opening Expert Disclosures (merits and non-class)	45 days following decision on class certification

Case Event	Deadline
Deadline for Rebuttal Expert Disclosures (merits and non-class)	45 days following filing of opening expert disclosures
Deadline for Reply Expert Disclosures (merits and non-class)	30 days following filing of rebuttal expert disclosures
Close of Expert Discovery	30 days following filing of reply expert disclosures
All opening dispositive motions filed	45 days following the close of expert discovery

IT IS SO STIPULATED.

1 DATED: October 25, 2024

GIBSON, DUNN & CRUTCHER LLP

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3 By: /s/ Elizabeth K. McCloskey

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25 *Attorneys for Defendant Meta Platforms, Inc.*

1 DATED: October 25, 2024

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Attorneys for Plaintiffs

[PROPOSED] ORDER**PURSUANT TO STIPULATION, IT IS HEREBY ORDERED:**

1. All discovery matters are referred to Magistrate Judge Virginia K. DeMarchi.
2. The case management schedule is as follows:

Case Event	Deadline
Amendments to Pleadings deadline	January 3, 2025
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Close of Expert Discovery	30 days following filing of reply expert disclosures
All opening dispositive motions filed	45 days following the close of expert discovery

Dated: _____

 Jeffrey S. White
 United States District Judge

CIVIL L.R. 5-1(i)(3) ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I, Elizabeth K. McCloskey, hereby attest under penalty of perjury that concurrence in the filing of this document has been obtained from all signatories.

Dated: October 25, 2024

By: /s/ Elizabeth K. McCloskey